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Attorneys for Defendant and Cross-defendant
ST. PAUL FIRE AND MARINE INSURANCE COMPANY

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

CENTEX HOMES, a Nevada general
partnership,

Plaintiff,

vs.

NAVIGATORS SPECIALTY INSURANCE
COMPANY, a New York corporation;
EVEREST NATIONAL INSURANCE
COMPANY, a Delaware corporation;
INTERSTATE FIRE & CASUALTY
COMPANY, an Illinois corporation;
LEXINGTON INSURANCE COMPANY, a
Delaware corporation; FEDERAL
INSURANCE COMPANY, an Indiana
corporation; and UNDERWRITERS AT
LLOYDS LONDON, an England corporation;
ST. PAUL FIRE AND MARINE
INSURANCE COMPANY, a Connecticut
corporation,

Defendants.

CASE NO.: 2:16-cv-01958-JAD-VCF

STIPULATION AND ~~PROPOSED~~
ORDER FOR EXTENSION OF TIME TO
FILE RESPONSIVE PLEADING TO
EVEREST NATIONAL INSURANCE
COMPANY'S CROSS-CLAIM

(First Request)

Defendant and Cross-defendant St. Paul Fire and Marine Insurance Company ("St. Paul"), by and through its counsel of record, Ramiro Morales, of the Law Offices of Morales Fierro & Reeves, and Defendant, Counterclaimant and Cross-claimant Everest National Insurance Company ("Everest"), by and through its counsel of record, Theodore J. Kurtz, of Selman Breitman LLP, hereby stipulate to extend the deadline for St. Paul's filing of a response to Everest's Cross-claim. Currently pending before the Court is

1 St. Paul's Motion to Dismiss Plaintiff Centex's complaint for lack of subject matter jurisdiction. In light of
2 St. Paul's pending Motion to Dismiss, Everest and St. Paul hereby stipulate and agree that St. Paul's time to
3 respond to Everest's complaint shall be extended such that St. Paul's response to Everest's cross-claim will
4 be due 14 days from the date of entry of the Court's order ruling on St. Paul's Motion to Dismiss.

5 This is the first stipulation for the extension of Federal's time to respond to Everest's Cross-claim.

6 DATED: January 30, 2017

MORALES FIERRO & REEVES

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8 By /s/ Ramiro Morales
9 Ramiro Morales (NV Bar No. 7101)
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10 Las Vegas, NV 89106
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11 Attorneys for Defendant and Cross-defendant
12 ST. PAUL FIRE AND MARINE INSURANCE
13 COMPANY

14 DATED: January 30, 2017

SELMAN BREITMAN LLP

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16 By: /s/ Theodore J. Kurtz
17 Theodore J. Kurtz (NV Bar No. 1344)
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18 Las Vegas, NV 89169
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19 Attorneys for Defendant, Counterclaimant and Cross-
20 claimant EVEREST NATIONAL INSURANCE
21 COMPANY

22 ~~PROPOSED~~ ORDER

23 IT IS SO ORDERED: Defendant and Cross-defendant St. Paul Fire and Marine Insurance
24 Company's response to Everest National Insurance Company's Cross-claim is due 14 days after entry of the
25 Court's order ruling on St. Paul's pending Motion to Dismiss Plaintiff Centex's complaint for lack of subject
26 matter jurisdiction.

27 Dated: 1-31-2017

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UNITED STATES MAGISTRATE JUDGE